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August 6, 2020

By ECF and Electronic Mail
The Honorable Frederic Block
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Jonathan Deutsch, 18 Cr. 502 (FB)

Dear Judge Block:

We write to let the Court know that--at Judge Matsumoto's suggestion in an analogous motion pending before her--Federal Defenders is prepared to coordinate with the Grand Jury administrator on behalf of all defense counsel who have filed motions seeking disclosure of information regarding the composition of the EDNY Grand Jury, should the Court order such disclosure. *See attached.*

We also renew our request for the Court to assist us in obtaining the information necessary for the parties to meaningfully litigate the grand jury issues by arranging a telephone conference with the Grand Jury administrator.

Respectfully submitted,

/s/

Kannan Sundaram
Deirdre D. von Dornum
Counsel for Jonathan Deutsch
Federal Defenders of New York

cc: AUSA Megan Farrell (via ECF)
AUSA Maggie Lee (via ECF)